

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE

JOHNNY M. HUNT,  
Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;  
GUIDEPOST SOLUTIONS LLC; and  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION,

Defendants.

Case No. 3:23-cv-00243  
Judge Richardson  
Magistrate Judge Frensley

**RESPONSES AND OBJECTIONS OF DEFENDANT GUIDEPOST SOLUTIONS  
LLC TO PLAINTIFF JOHNNY M. HUNT'S SECOND  
REQUEST FOR PRODUCTION**

Defendant Guidepost Solutions LLC ("Guidepost"), by and through its attorneys, Riley & Jacobson, PLC and Mintz & Gold LLP, hereby responds to Plaintiff Johnny M. Hunt's Second Request for Production as follows:

**GENERAL OBJECTIONS**

Guidepost incorporates by reference the General Objections set forth in Plaintiff Johnny M. Hunt's First Request for Production (the "Requests") and repeats them as if fully set forth herein.

**RESPONSES**

**REQUEST NO. 1.**

**All audio recordings referenced in the letter sent by Steven G. Mintz on behalf of Guidepost to Robert D. MacGill dated March 13, 2023.**

**Response:** Guidepost will search for and produce responsive documents.

Respectfully submitted,

s/ John R. Jacobson

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-and-

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been served by electronic mail on the following:

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*Counsel for the Executive Committee of the  
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on this 17<sup>th</sup> day of August, 2023.

s/John R. Jacobson